

My name is Wallace Walcher. I am the owner of Airosurf Communications, an Oklahoma-based Wireless Internet Service Provider. In business since 2003, Airosurf focuses primarily on the rural areas north and east of Oklahoma City. It has grown organically since 2003 and currently has approximately 1,800 customers, with a net 20% customer growth in 2018. Airosurf offers speeds from 4/1.5 mb/s on up to a recent link of 300/300 provided for a recent Google event in downtown Oklahoma City.

Airosurf has several connections in the 3650-3700 Mhz band, and I was very excited when the original NPRM was issued for CBRS. I was especially excited that, unlike virtually all the previous spectrum auctions, the geographic areas (census tracts) utilized in the proposed auction were such that Airosurf would be able to participate. Having access to the CBRS band as a "PAL" holder would be extremely beneficial, allowing Airosurf to offer speeds and guaranteed levels of service currently attainable. 25-50mb/s and even higher customer connections would be easily achieved by a locally owned company that provides superior customer service and more open and honest pricing than the national telecom and cable companies.

And so, I was greatly disappointed when the FCC dramatically changed course with the recent NPRM. Changing the size of the auction areas from Census Tracts to Partial Economic Areas would effectively price companies like Airosurf, who provide a superior customer service experience, out of the market. The only companies who will be able to participate will be the above-mentioned national telecoms and cable companies. The nation's high-speed broadband access options would be further reduced to an even thinner and less customer-responsive Oligopoly. Is this beneficial for the population that you are charged to serve? I do not believe it is.

Therefore, I respectfully urge you to reconsider your recent NPRM and return to your original GREAT idea of having a true and fair auction for all the companies who are providing broadband internet access to all the areas of this great nation. Please change back to using Census Tracts as the geographical components of the auction.

Thank you for your consideration of the above.

Respectfully yours,



Wallace L. Walcher  
President  
Airosurf Communications, Inc.